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8 *Attorney for Plaintiff*

9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA

11 RONEN HELMANN,
12 Plaintiff,

13 v.

14 CODE PINK WOMEN FOR PEACE, et
15 al.,
16 Defendants.

Case No.: 8:24-cv-05704-SVC-PVC

**DECLARATION OF MARK L.
JAVITCH IN SUPPORT OF
MOTION TO CONSOLIDATE
CASES**

17 I, Mark L. Javitch, hereby declare the following in support of Plaintiff's Motion to
18 Consolidate:

- 19
- 20 1. I am an attorney duly licensed to practice in the State of California and before
21 the District Court for the Central District of California.
 - 22 2. I am competent to testify to the matters stated herein.
 - 23 3. This declaration is based on personal knowledge of the matters set forth herein.
 - 24 4. I am an attorney of record for Plaintiff in the instant matter.
 - 25 5. *StandWithUs v. CodePink et al.* No. 2:24-cv-06253 is a very similar action to
26 this case.
- 27
- 28

1 6. A true and correct copy of the *StandWithUs* complaint is attached as Exhibit
2 "A"

3 7. I have met and conferred with counsel for Plaintiff in the *StandWithUs* case,
4 and the *StandWithUs* Plaintiff consents and joins in the motion to consolidate.

5 8. On October 30, 2024, I emailed defendants' counsel requesting their position on
6 the motion to consolidate by the close of business October 31, 2024. As of the
7 time of this filing, however, I did not receive a final response.

8
9 I declare, under penalty of perjury, that the foregoing is true and correct. This
10 declaration is executed on the date stated below in San Mateo, California.

11
12 Dated: November 4, 2024

By: /s/ Mark L. Javitch
Mark L. Javitch